

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

ATTORNEY MONTHLY FEE STATEMENT COVER SHEET
FOR THE PERIOD AUGUST 12, 2023 THROUGH AUGUST 31, 2023

In re LTL Management LLC

Applicant: Cole Schotz P.C.

Case No. 23-12825 (MBK)

Client: Ad Hoc Committee of Supporting
Counsel

Chapter 11

Case Filed: April 4, 2023

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION
UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746.

<u>/s/ Michael D. Sirota</u>	<u>03/6/2024</u>
MICHAEL D. SIROTA	Date

<p style="text-align: center;">SECTION I FEE SUMMARY</p>
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Summary of Amounts Requested for the Period

August 12, 2023 through August 31, 2023 (the “Compensation Period”)

Total Fees	\$18,158.00
Total Disbursements	\$0.00
Minus % holdback of Fees	\$3,631.60
Amount Sought at this Time	\$14,526.40

Summary of Amounts Requested for Previous Periods

Total Previous Fees and Expenses Requested:	\$1,196,650.86
Total Fees and Expenses Allowed to Date:	\$1,196,650.86
Total Retainer Remaining:	\$0.00
Total Holdback:	\$0.00
Total Received by Applicant:	\$1,196,650.86

Name of Professional and Title	Year Admitted	Hours	Rate	Fee
Seth Van Aalten Member	2004	2.90	\$950.00	\$2,755.00
Justin R. Alberto Member	2008	1.50	\$740.00	\$1,110.00
Sarah A. Carnes Member	2015	2.50	\$760.00	\$1,900.00
Bryant P. Churbuck Associate	2018	12.20	\$460.00	\$5,612.00
Larry S. Morton Paralegal	n/a	19.00	\$355.00	\$6,745.00
Pauline Z. Ratkowiak Paralegal	n/a	0.10	\$360.00	\$36.00
TOTALS	n/a	38.20	n/a	\$18,158.00

**SECTION II
SUMMARY OF SERVICES**

Services Rendered	Hours	Fee
Asset Analysis	0.00	\$0.00
Asset/Business Disposition	0.00	\$0.00
Assumption and Rejection of Leases and Contracts	0.00	\$0.00
Preference Actions/Response	0.00	\$0.00
Budgeting (Case)	0.00	\$0.00
Business Operations	0.00	\$0.00
Case Administration	19.10	\$6,781.00
Claims Administration and Objections	0.00	\$0.00
Corporate Governance and Board Matters	0.00	\$0.00
Data Analysis	0.00	\$0.00
Employee Benefits/Pensions	0.00	\$0.00
Fee Application Preparation	10.40	\$4,874.00
Fee Employment	0.00	\$0.00
Fee Objections	0.00	\$0.00
Financing	0.00	\$0.00
Litigation	8.70	\$6,503.00
Meetings of Creditors	0.00	\$0.00
Disclosure Statement	0.00	\$0.00
Plan of Reorganization	0.00	\$0.00
Real Estate	0.00	\$0.00
Regulatory Compliance	0.00	\$0.00
Relief from Stay	0.00	\$0.00
Reporting	0.00	\$0.00
Tax Issues	0.00	\$0.00
Valuation	0.00	\$0.00
Non-Working Travel	0.00	\$0.00
SERVICES TOTALS	38.20	\$18,158.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

Disbursements	Amount
None.	\$0.00
DISBURSEMENTS TOTAL	\$0.00

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

PAUL HASTINGS LLP
200 Park Avenue
New York, New York 10166
Kristopher M. Hansen (*admitted pro hac vice*)
Ryan P. Montefusco (*admitted pro hac vice*)

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Warren A. Usatine
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700 Milam, Suite 1300
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Lenard M. Parkins (*admitted pro hac vice*)
Charles M. Rubio (*admitted pro hac vice*)

*Counsel to Ad Hoc Committee of Supporting
Counsel*

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**MONTHLY FEE STATEMENT OF COLE SCHOTZ P.C.,
AD HAC COMMITTEE OF SUPPORTING COUNSEL, FOR THE
PERIOD AUGUST 12, 2023 THROUGH AUGUST 31, 2023**

Cole Schotz P.C. (“Cole Schotz”) submits this Monthly Fee Statement (the “Statement”) for services rendered and expenses incurred as Counsel to the Ad Hoc Committee of Supporting Counsel² for the period commencing August 12, 2023 and ending August 31, 2023 (the “Statement Period”), pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professions* [Docket No. 562] (as modified, the “Interim Fee Procedures Order”).

The billing invoices, along with a detailed breakdown of all out-of-pocket disbursements necessarily incurred by Cole Schotz for the Statement Period are annexed hereto. These invoices detail the services performed by Cole Schotz.

The fees requested and expenses incurred in this Statement are as follows:

Fees (100%)	Fee Holdback (20%)	Fee Payment (80%)	Expense Reimbursement (100%)
\$18,158.00	\$3,631.60	\$14,526.40	\$0.00

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² On June 20, 2023, the Bankruptcy Court entered the *Order Authorizing the Debtor to Enter into an Expense Reimbursement Agreement with Ad Hoc Committee of Supporting Counsel* [Docket No. 838] that provides for the reimbursement of fees from April 18, 2023 through the termination of the Reimbursement Agreement (together, the “Fees and Expenses”).

WHEREFORE, Cole Schotz respectfully requests payment of fees and reimbursement of expenses for the Statement Period of \$14,526.40 (80% of total fees and 100% of expenses) in accordance with the Reimbursement Order.

Dated: March 6, 2024

COLE SCHOTZ P.C.

*Counsel to Ad Hoc Committee
of Supporting Counsel*

/s/ Michael D. Sirota

Michael D. Sirota (NJ Bar No. 014321986)

Exhibit A



LTL MANAGEMENT LLC

N/A

Invoice Date: September 8, 2023

Invoice Number: 957434

Matter Number: 66055-0001

Re: LTL AD HOC GROUP

FOR PROFESSIONAL SERVICES THROUGH AUGUST 31, 2023

CASE ADMINISTRATION			19.10	6,781.00
<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/14/23	PVR	EMAIL FROM ACCOUNTING AND TO M. BALES RE: LEDES FILE FOR JUNE 2023	0.10	36.00
08/14/23	LSM	RESEARCH INTERIM/FINAL FEE APPLICATION SAMPLE	0.60	213.00
08/14/23	LSM	DRAFT CERTIFICATE OF SERVICE REGARDING THIRD MONTHLY FEE APPLICATIONS AND FORWARD SAME TO B. CHURBUCK	0.40	142.00
08/14/23	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION AND FILING DEADLINES	0.30	106.50
08/15/23	LSM	REVISE AND FILE TWO CERTIFICATES OF SERVICE REGARDING THREE MONTHLY FEE APPLICATIONS	0.40	142.00
08/17/23	LSM	RESEARCH SAMPLE INTERIM FEE APPLICATION FOR NJ IN PREPARATION FOR COLE SCHOTZ FIRST INTERIM FEE APPLICATION	0.60	213.00
08/21/23	LSM	EMAILS WITH B. CHURBUCK REGARDING JULY MONTHLY FEE APPLICATION DRAFT FOR COLE SCHOTZ	0.20	71.00
08/21/23	LSM	DRAFT FOURTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ	0.70	248.50
08/22/23	LSM	REVIEW INTERIM FEE APPLICATION SAMPLES FOR FIRST INTERIM FEE APPLICATION DRAFT	0.50	177.50
08/22/23	LSM	COMPLETE DRAFT OF FOURTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ JUNE 2023 FEES/EXPENSES AND FORWARD SAME TO B. CHURBUCK	1.50	532.50
08/22/23	LSM	DRAFT NOTICE OF RATE INCREASE AND FORWARD SAME TO S. CARNES AND B. CHURBUCK	0.40	142.00
08/23/23	LSM	DRAFT THREE CERTIFICATES OF NO OBJECTION REGARDING THIRD MONTHLY FEE APPLICATIONS AND FORWARD SAME TO B. CHURBUCK RE: PAUL HASTINGS, COLE SCHOTZ, AND PARKINS RUBIO	0.60	213.00
08/23/23	LSM	CONTINUE DRAFT OF FIRST INTERIM FEE APPLICATION FOR COLE SCHOTZ	0.90	319.50
08/24/23	LSM	REVISE NOTICE OF RATE INCREASE AND FORWARD TO B. CHURBUCK	0.40	142.00

COLE SCHOTZ P.C.

Re: LTL AD HOC GROUP
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/24/23	LSM	COMPLETE DRAFT OF FIRST INTERIM AND FINAL FEE APPLICATION AND FORWARD SAME TO B. CHURBUCK WITH COMMENTS	3.60	1,278.00
08/24/23	LSM	EMAILS WITH ACCOUNTING DEPARTMENT REGARDING REVISIONS TO EXHIBITS TO FIRST INTERIM FEE APPLICATION FOR COLE SCHOTZ	0.30	106.50
08/24/23	LSM	REVISE AND UPDATE TWO CERTIFICATES OF NO OBJECTION REGARDING THIRD MONTHLY FEE APPLICATIONS FOR PAUL HASTINGS AND COLE SCHOTZ	0.30	106.50
08/24/23	LSM	REVIEW NJ NOTICE OF APPEAL PROCEDURES	0.50	177.50
08/25/23	LSM	REVISE/UPDATE TWO CERTIFICATES OF NO OBJECTION REGARDING JUNE 2023 MONTHLY FEE APPLICATIONS FOR PAUL HASTINGS AND COLE SCHOTZ	0.30	106.50
08/25/23	LSM	ASSIST WITH FILING PREPARATIONS FOR NOTICE OF APPEAL	0.90	319.50
08/25/23	LSM	UPDATE FIRST INTERIM FEE APPLICATION FOR COLE SCHOTZ	0.40	142.00
08/25/23	LSM	ASSIST WITH FILING PREPARATIONS FOR TWO CERTIFICATES OF NO OBJECTION REGARDING THIRD MONTHLY FEE APPLICATIONS	0.50	177.50
08/25/23	LSM	UPDATE, FILE AND CIRCULATE TO B. CHURBUCK TWO CERTIFICATES OF NO OBJECTION REGARDING PAUL HASTINGS AND COLE SCHOTZ THIRD MONTHLY FEE APPLICATIONS	0.50	177.50
08/28/23	LSM	EMAILS WITH ACCOUNTING DEPARTMENT REGARDING REVISIONS TO EXHIBITS TO FOURTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ	0.30	106.50
08/29/23	LSM	REVISE FOURTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ AND FORWARD SAME TO B. CHURBUCK	0.60	213.00
08/31/23	LSM	COMPLETE DRAFT OF FIRST INTERIM AND FINAL FEE APPLICATION FOR COLE SCHOTZ AND FORWARD SAME TO S. CARNES AND B. CHURBUCK WITH COMMENTS	3.30	1,171.50

FEE APPLICATION PREPARATION **10.40** **4,874.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/21/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN RE: INTERIM FEE APPLICATIONS AND JULY MONTHLY FEE STATEMENT	0.20	92.00
08/21/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO L. MORTON RE: INTERIM FEE APPLICATIONS AND JULY MONTHLY FEE STATEMENT	0.30	138.00
08/23/23	BPC	REVIEW EMAIL FROM L. MILIOTES RE: JUNE MONTHLY FEE STATEMENT	0.10	46.00
08/23/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO COLE SCHOTZ LTL TEAM RE: JUNE MONTHLY FEE STATEMENT	0.30	138.00
08/23/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM L. MORTON RE: CERTIFICATE OF NO OBJECTION FOR JUNE MONTHLY FEE STATEMENT	0.20	92.00

Re: LTL AD HOC GROUP
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/24/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO M. MURPHY AND L. MILIOTES RE: JUNE MONTHLY FEE STATEMENT	0.40	184.00
08/24/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO G. JACKSON RE: JULY MONTHLY FEE STATEMENTS	0.20	92.00
08/24/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN RE: CERTIFICATES OF NO OBJECTION FOR JUNE MONTHLY FEE STATEMENTS	0.20	92.00
08/24/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN AND R. MONTEFUSCO RE: NOTICE OF APPEAL FROM ORDER DISMISSING CASE	0.50	230.00
08/24/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO L. MORTON RE: CERTIFICATES OF NO OBJECTION FOR JUNE MONTHLY FEE STATEMENTS	0.40	184.00
08/27/23	BPC	REVIEW EMAIL FROM C. RUBIO RE: JULY MONTHLY FEE STATEMENT	0.10	46.00
08/27/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN RE: JULY MONTHLY FEE STATEMENT	0.20	92.00
08/28/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM L. MORTON RE: JULY MONTHLY FEE STATEMENT	0.40	184.00
08/29/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO L. MILIOTES RE: INTERIM AND FINAL FEE APPLICATION	0.30	138.00
08/29/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO L. MORTON RE: JULY AND AUGUST MONTHLY FEE STATEMENTS	0.20	92.00
08/29/23	BPC	REVIEW JULY AND AUGUST MONTHLY FEE STATEMENTS	0.40	184.00
08/29/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN AND S. CARNES RE: INTERIM AND FINAL FEE APPLICATIONS	0.30	138.00
08/29/23	SYC	EMAILS TO B. CHURBUCK RE: FEE APPLICATIONS	0.30	228.00
08/29/23	BPC	PREPARE AND REVISE INTERIM AND FINAL FEE APPLICATION	3.00	1,380.00
08/29/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN AND S. PETRIELLO RE: AUGUST MONTHLY FEE STATEMENT	0.30	138.00
08/31/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO L. MILIOTES RE: INTERIM AND FINAL FEE APPLICATIONS	0.20	92.00
08/31/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO L. MORTON RE: INTERIM AND FINAL FEE APPLICATIONS	0.20	92.00
08/31/23	BPC	PREPARE EMAILS TO S. VAN AALTEN RE: CERTIFICATIONS OF NO OBJECTION	0.10	46.00
08/31/23	BPC	REVISE INTERIM AND FINAL FEE APPLICATION	0.50	230.00
08/31/23	BPC	REVISE JULY AND AUGUST MONTHLY FEE STATEMENT	1.10	506.00

LITIGATION **8.70** **6,503.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/07/23	SYC	ATTEND HAAS DEPO	2.20	1,672.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/16/23	BPC	TELEPHONIC CONFERENCE WITH STEERING COMMITTEE RE: POST-DISMISSAL MATTERS	0.50	230.00
08/16/23	SVA	CONF W/ PH RE FINAL FEE APPS AND NEXT STEPS	0.60	570.00
08/21/23	JRA	EMAILS WITH CLIENTS RE APPEAL ISSUES	0.30	222.00
08/21/23	SVA	CORRES W/ AHC RE DISMISSAL APPEAL	0.20	190.00
08/24/23	JRA	EMAILS WITH CLIENTS RE NOTICE OF APPEAL (.2); REVIEW NOTICE OF APPEAL (.1)	0.30	222.00
08/24/23	SVA	CORRES W/ PH RE NOTICE OF APPEAL OF MTD RULING	0.20	190.00
08/25/23	SVA	PREPARATION OF NOTICE OF APPEAL OF MTD	1.40	1,330.00
08/25/23	SVA	CORRES W/ PH TEAM RE NOTICE OF APPEAL OF MTD FILING	0.50	475.00
08/25/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN RE: NOTICE OF APPEAL FROM ORDER DISMISSING CASE	0.30	138.00
08/25/23	BPC	REVIEW EMAILS FROM S. VAN AALTEN AND L. MORTON RE: NOTICE OF APPEAL FROM ORDER DISMISSING CASE	0.30	138.00
08/25/23	BPC	REVIEW EMAILS FROM COLE SCHOTZ, PAUL HASTINGS, AND PARKINS AND RUBIO LTL TEAMS RE: NOTICE OF APPEAL FROM ORDER DISMISSING CASE	0.80	368.00
08/28/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. CARNES RE: CHALLENGE DEADLINE	0.20	92.00
08/30/23	JRA	EMAILS RE APPEALS	0.30	222.00
08/31/23	JRA	T/C WITH STEEROCO MEMBER (.3); EMAILS WITH STEERCO MEMBERS RE APPEAL ISSUES (.3)	0.60	444.00

TOTAL HOURS 38.20

PROFESSIONAL SERVICES: \$18,158.00

TIMEKEEPER SUMMARY

<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Bryant P. Churbuck	Associate	12.20	460.00	5,612.00
Justin R. Alberto	Member	1.50	740.00	1,110.00
Larry S. Morton	Paralegal	19.00	355.00	6,745.00
Pauline Z. Ratkowiak	Paralegal	0.10	360.00	36.00
Sarah A. Carnes	Member	2.50	760.00	1,900.00
Seth Van Aalten	Member	2.90	950.00	2,755.00
Total		38.20		\$18,158.00

COLE SCHOTZ P.C.

Re: LTL AD HOC GROUP
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TOTAL SERVICES: \$ 18,158.00

TASK SUMMARY

<u>TASK CODE</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
NJ812	FEE APPLICATION PREPARATION	10.40	4,874.00
NJ821	LITIGATION	8.70	6,503.00
NJ839	CASE ADMINISTRATION	19.10	6,781.00
	Total	38.20	\$18,158.00



LTL MANAGEMENT LLC
N/A

Invoice Date: September 8, 2023
Invoice Number: 957434
Matter Number: 66055-0001

REMITTANCE PAGE

PROFESSIONAL SERVICES THROUGH AUGUST 31, 2023

Client: AD HOC GROUP OF SUPPORTING COUNSEL
Matter: LTL AD HOC GROUP

TOTAL FEES: \$ 18,158.00
TOTAL DUE THIS INVOICE: \$ 18,158.00

PLEASE RETURN THIS COPY WITH YOUR PAYMENT

For payments via ACH (e-check) or Credit Card please visit
<http://payments.coleschotz.com>

or use the QR Code



For payments made via Wire
Account Name: Cole Schotz P.C.
Bank of America, Account #4380000240
ABA #026009593

Please call 201-525-6280 for assistance with payments